

## REMARKS

Reconsideration of the application in view of the following remarks is respectfully requested. No claims are amended, added or cancelled in this reply. Hence, Claims 1-9, 13-21, and 25-27 are currently pending in the application.

### CLAIMS REJECTIONS—35 USC 103

The Office Action rejected Claims 1-9, 13-21, and 25-27 under 35 U.S.C. 103(a) as being unpatentable, allegedly, over U.S. Patent No. 6,493,837 (“Pang”) in view of the Background section of the present application (“the Background”) and “Java Network Programming, 2<sup>nd</sup> Edition” by Elliotte Rusty Harold (“Harold”). The rejections are traversed, respectfully, for at least the reasons discussed below.

#### *Claims 1-9 and 13-21*

Claim 1 recites, *inter alia*, “identifying one or more free buffers that are within a free buffer pool, wherein said free buffer pool maintains free data buffers **that may be inserted into different data structures of a plurality of data structures, each of which is associated with a different web site domain.**”

The Office Action alleges that Pang discloses a free buffer pool (allegedly, free buffer list 220) that maintains free data buffers (allegedly, log buffers 204) that may be inserted into different data structures of a plurality of data structures (allegedly, set of associated buffers 221). However, the Office Action admits that Pang fails to disclose that data structures in a plurality of data structures are each associated with a different web site domain. Indeed, Pang does not teach or suggest that data structures in a plurality

of data structures (allegedly, set of associated buffers 221) are associated with different web site domains.

In an attempt to compensate for this shortcoming, the Office Action alleges that a plurality of data structures, each of which is associated with a different web site domain, is discussed in the Background section of the present application (FIG. 1B, buffers 170-176). The Office Action apparently takes the position that one of ordinary skill, reading both Pang and the Background, would find it obvious to modify Pang's set of associated buffers 221 so that the buffers therein would be associated with different web site domains as allegedly disclosed in the Background.

However, such a modification would not result in the feature of Claim 1 quoted above. The feature of Claim 1 quoted above requires that **the data structures into which the buffers are inserted**, rather than the buffers themselves, be associated with different web site domains. The Background discusses buffers, but does not disclose any data structures into which buffers are inserted at all. Thus, the allegedly "admitted prior art" does **not** comprise "data structures into which buffers are inserted."

In fact, although Pang refers to log buffers 204 being associated with various processors 200 via set of associated buffers 221, Pang does not indicate that log buffers 204 are ever "inserted" into "data structures" in order to achieve this association. In order to expedite prosecution, Applicants request that the next Office Action, if there should be one, expressly indicate what elements of Pang are supposed to be analogous to data structures into which buffers may be inserted.

Data buffers are not the same as data structures into which data buffers may be inserted. Modifying **data buffers** to be associated with different web site domains would

not thereby produce **data structures** which are associated with different web site domains and into which data buffers may be inserted. Modifying Pang's log buffers 204 so that each log buffer was associated with a different web site domain would merely lead to a duplication of a portion of the problematic system described in the Background. In the Background, buffers 170-176 **are** associated with different web site domains (but there are no data structures, associated with different web site domains, into which any of buffers 170-176 may be inserted).

The problems with the scheme in which each buffer was dedicated to a single web site domain is disclosed in the present application starting on page 4 at line 21, and continuing to page 5, line 6. The method recited in Claim 1 overcomes these problems, for reasons that are discussed in the present application. The combination proposed by the Office Action would not overcome these problems.

Perhaps the Office Action actually meant that one of ordinary skill would have found it obvious to modify some elements of Pang other than log buffers 204, thereby resulting in those elements being associated with different web site domains. If this was the case, the identities of those other elements were not discernable from the Office Action or from any of the references. If the Office Action intended to modify some elements of Pang other than log buffers 204 in this way, then the Office Action should have presented some reason as to why one would have been motivated to modify those **non-buffer** elements in this way, when the quality (association with different web site domains) that the Office Action was seeking to instill in those non-buffer elements is **only** associated with **buffers** in the Background. It would not have been obvious to one

of ordinary skill to apply, to **non-buffer** elements of Pang, the teachings of the Background with regard to **buffers**.

Therefore, even if the teachings of Pang with regard to buffers and the teachings of the Background with regard to buffers could be combined to produce a free buffer pool that maintained free data buffers each of which were associated with different web site domains, the combination **still** would **not** produce a “free buffer pool [that] maintains free data buffers **that may be inserted into different data structures of a plurality of data structures, each of which is associated with a different web site domain**” as recited in Claim 1. It is not enough that the buffers themselves should be associated with different web site domains.

The Office Action also cites Harold in the rejection of Claim 1, but does not rely upon any portion of Harold to disclose any portion of Claim 1 specifically discussed above. The Office Action only relies on Harold to disclose, allegedly, a different portion of Claim 1.

Thus, Claim 1 is patentable over Pang, the Background, and Harold, whether taken individually or in combination, under 35 U.S.C. 103(a).

Claims 2-9 depend from Claim 1 and therefore include all of the distinguished features of Claim 1. Thus, Claims 2-9 are patentable over Pang, the Background, and Harold for at least the reasons given above with reference to Claim 1.

Claims 13-21 recite computer-readable media that carry instructions for causing one or more processors to perform the methods of Claims 1-9, respectively. Therefore, Claims 13-21 are patentable over Pang, the Background, and Harold for at least the reasons given above in connection with Claims 1-9, respectively.

*Claims 25-27*

There are several features of Claim 25 that are not recited in Pang, the Background, or Harold. Some of these features are discussed below. Remarkably, the Office Action alleges that **almost all** of these **many** features are disclosed within paragraphs 3 and 7 of the Background and col. 5, lines 2-15 of Pang, which, taken together, are relatively short.

Claim 25 recites, *inter alia*, “queueing the first request within a connection queue.” The Background says nothing about a connection queue. A quick glance at FIGs. 1A and 1B, referenced in the Background, reveals that connection queue 208 of FIG. 2A is **conspicuously missing**. Claim 25 also recites, “queueing the second request within **the** connection queue.” The first and second requests are queued in the **same** connection queue, yet the first and second requests request content from **different web site domains** (“wherein the second web site domain is separate from the first web site domain”). Clearly, since the system described in the Background only allows requests for content from a particular web site domain to be stored in a buffer dedicated solely to that web site domain, there would be no need for any queueing, within the **same** connection queue, of requests for content from different web site domains.

Harold and Pang also say nothing about a connection queue into which requests for access to content associated with different web site domains are queued. If a future Office Action alleges that Harold or Pang discloses such a connection queue, then Applicants respectfully request that the Office Action expressly state what element in Harold or Pang is supposed to be analogous to the connection queue.

Claim 25 also recites, “in response to being assigned a task of servicing the first request, the first server thread **determining to which web site domain of the plurality of web site domains the first request is related.**” This is clearly not disclosed in the Background. Server threads 160-166, discussed in the Background, have absolutely **no need** to make such a determination, since each server thread is dedicated solely to **one web site domain**. On page 4, lines 17-19, the Background says, “each server thread . . . executes in a separate memory address space and **services access requests for only a single web site domain.**” In addition, the Background actually says, on page 3, lines 13-16, “if any of the buffers become full, the contents of the buffer may be stored to a single file . . . **without having to determine which web site domain was associated with the request.**”

The Office Action already admits that Pang does not disclose the concept of a plurality of web site domains, so there is no way that Pang discloses a server thread that makes such a determination. The Office Action does not even rely upon Harold to disclose this feature of Claim 25.

Claim 25 also recites, “**the first server thread loading first configuration data for the first web site domain** in response to determining that the first request is related to the first web site domain, wherein, **by loading the first configuration data**, the first server thread is **temporarily configured** as a server thread that is dedicated to servicing requests for content that is available within the first web site domain.” As is discussed above, the Background makes it clear that server threads 160-166 are **permanently dedicated** to separate web site domains. Therefore, there is no need for any of threads 160-166 to load configuration data that causes any of threads 160-166 to be **temporarily**

configured as a server thread that services requests for a particular web site domain. The Background says absolutely nothing about threads loading configuration data or being temporarily configured.

The Office Action already admits that Pang does not disclose the concept of a plurality of web site domains, so there is no way that Pang discloses a server thread that loads configuration data for a particular web site domain of such a plurality of web site domains. The Office Action does not even rely upon Harold to disclose this feature of Claim 25. Neither Pang nor Harold says anything about server threads loading configuration data that temporarily configures those threads. If a future Office Action alleges that Harold or Pang discloses such configuration data, then Applicants respectfully request that the Office Action expressly state what element in Harold or Pang is supposed to be analogous to the configuration data.

Claim 25 also recites, “**the first server thread selecting, from among a plurality of buffer files, a first buffer file,**” and “**the first server thread selecting a first buffer from among a plurality of buffers in the first buffer file.**” Therefore, Claim 25 requires that a server thread first select a **buffer file**, and then select a buffer **within the selected buffer file**. The Background says nothing about buffer files that comprise multiple buffers or threads selecting such buffer files. Even if Pang discloses that a thread selects a log buffer from among a plurality of log buffers, Pang says nothing about a thread selecting a **buffer file** from among a plurality of buffer files, and then selecting one of a plurality of buffers within that buffer file. The Office Action does not even rely upon Harold to disclose this feature of Claim 25.

Thus, Claim 25 is patentable over Pang, the Background, and Harold, whether taken individually or in combination, under 35 U.S.C. 103(a).

Claims 26 and 27 depend from Claim 25 and therefore include all of the distinguished features of Claim 25. Thus, Claims 26 and 27 are patentable over Pang, the Background, and Harold for at least the reasons given above with reference to Claim 25.

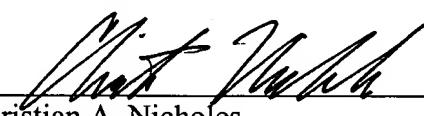
## CONCLUSION

For at least the reasons set forth above, it is respectfully submitted that all pending claims are patentable over the art of record, including the art cited but not applied. Accordingly, allowance of all claims is hereby respectfully solicited.

Respectfully submitted,

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